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7                   **UNITED STATES DISTRICT COURT**  
8                   **WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

9                   **NICHOLAS BARNARD**

10                      Plaintiffs,

11                      v.

12                   **COLUMBIA DEBT RECOVERY, LLC, dba**  
13                   **GENESIS,**

14                      Defendants.

15                   CASE NO.

16                   NOTICE OF REMOVAL

17                   (CLERKS ACTION REQUIRED)

18                   TO: THE CLERK OF THE COURT  
19                   UNITED STATES DISTRICT COURT  
20                   WESTERN DISTRICT OF WASHINGTON AT SEATTLE

21                   Defendant, Columbia Debt Recovery, LLC, by and through its attorney, states:

22                   1.         An unfiled Summons and Complaint in the above action was served with on

23                   Defendant on May 1, 2020.

24                   2.         Pursuant to 28 U.S.C. §1446(b), this Notice of Removal is filed within  
25                   thirty (30) days after service of the Summons and Complaint.

26                   3.         Plaintiffs have alleged violations of the Fair Debt Collection Practices Act,  
27                   15 U.S.C. §1692 *et seq.* This Court has federal question jurisdiction over the subject  
28                   matter of this action pursuant to 28 U.S.C. §1331.

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30                   NOTICE OF REMOVAL - 1

31                   Mark T. Case, WSBA #38589  
32                   P.O. BOX 30131  
33                   SPOKANE, WA 99223  
34                   Phone: (425) 890-2817  
35                   Email: markcaselaw@gmail.com

4. Pursuant to 28 U.S.C. §1331 and 28 U.S.C. §1441(c), the above captioned lawsuit may be removed to this Court. This Court is a District Court of the United States for the district and division embracing the place where the state court action is pending and is therefore the appropriate Court for removal pursuant to 28 U.S.C. § 1441.

5. **Intra-district Assignment:** Defendant request that the Court assign the above captioned case to its Seattle Division. Plaintiffs are individuals believed to be residing in Seattle, Washington. The principal place of business of Defendant Columbia Debt Recovery LLC is in Snohomish County, Washington. The alleged claims took place in King and/or Snohomish County. The state court where Plaintiffs commenced the above captioned case is in King County. Venue is proper in the Seattle Division. 28 U.S.C. §1441(a)

Respectfully submitted this 29th day of May, 2020.

## COLUMBIA DEBT RECOVERY, LLC

/s/ Mark T. Case

Mark T. Case, WSBA # 38589  
Attorney for Columbia Debt Recovery LLC  
P.O. Box 30131  
Spokane, WA 99223  
Telephone: (425) 890-2817  
Facsimile: (425) 646-1395  
Email: [markcaselaw@gmail.com](mailto:markcaselaw@gmail.com)

## **CERTIFICATE OF SERVICE**

I certify under penalty of perjury of the laws of the State of Washington that on the date set forth below, I caused to be served true and correct copies of the forgoing to the parties listed below:

**NOTICE OF REMOVAL - 2**

Mark T. Case, WSBA #38589  
P.O. BOX 30131  
SPOKANE, WA 99223  
Phone: (425) 890-2817  
Email: markcaselaw@gmail.com

Name and Address of Party Served	Method of Service:
T. Tyler Santiago, WSBA #46004 Anderson Santiago 787 Maynard Ave. S Seattle, WA. 98104 206-395-2665 Email: <a href="mailto:tyler@alkc.net">tyler@alkc.net</a>	<input type="checkbox"/> Personal Service <input type="checkbox"/> First Class US Mail <input type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Electronic Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Legal Messenger
Jason Anderson, WSBA #38014 Anderson Santiago 787 Maynard Ave. S Seattle, WA. 98104 206-395-2665 Email: <a href="mailto:jason@alkc.net">jason@alkc.net</a>	

10 *Attorneys for Plaintiffs*

11

12 Dated in Spokane this 15 day of April, 2020.

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14

/s/ Mark T. Case

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Mark T. Case, WSBA # 38589

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Attorney for Columbia Debt Recovery LLC

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NOTICE OF REMOVAL - 3

Mark T. Case, WSBA #38589

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